

DENNIS J. HERRERA, State Bar #139669  
City Attorney  
MEREDITH B. OSBORN, State Bar #250467  
Chief Trial Deputy  
REBECCA A. BERS, State Bar # 287111  
Deputy City Attorney  
Fox Plaza  
1390 Market Street, Sixth Floor  
San Francisco, California 94102-5342  
Telephone: (415) 554-4224  
Facsimile: (415) 554-3837  
E-Mail: rebecca.bers@sfcityatty.or

Atorneys for Defendants  
KIERSTIE BARR, SAMSON HUNG, MARINA CHACON,  
FLINT PAUL and CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KIRSTIN JOHNSON, et al.,

**Plaintiffs,**

VS.

KIERSTIE BARR, et al.,

## Defendants.

Case No. 3:20-cv-01569-SK (KAW)

**STIPULATED ORDER TO CONTINUE THE  
CLOSE OF EXPERT DISCOVERY TO  
PERMIT TWO DEPOSITIONS**

State Court Action Filed: October 25, 2019  
Removal Filed: March 3, 2020  
Trial Date: October 12, 2021

1 The parties to the above-entitled action, hereby stipulate as follows:

2 WHEREAS, although the parties have diligently attempted to schedule expert depositions, they  
3 have been unable to do so for two expert witnesses within the time currently permitted for expert  
4 discovery;

5 WHEREAS, the inability to schedule these two expert witnesses is the result of conflicts  
6 between and among the expert witnesses' busy schedules and counsel's busy schedules;

7 WHEREAS, the Parties have agreed to take two depositions, namely the two parties'  
8 respective police practices experts, by or before April 30, 2021;

9 WHEREAS, this revised deadline will not interfere with the briefing schedule on dispositive  
10 motions, the last day for hearing dispositive motions being June 28, 2021, and Plaintiffs not intending  
11 to file a cross-motion;

12 THEREFORE, THE PARTIES HEREBY STIPULATE AND REQUEST, by and through their  
13 attorneys of record, that:

14 The Court modify the close of expert discovery from April 16, 2021 to April 30, 2021 solely to  
15 permit the depositions of the parties' respective police practices experts. All other deadlines,

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including the expert disclosure deadlines, dispositive motion deadline, trial and pretrial hearing dates, are unaffected by this stipulation.

Dated: April 8, 2021

DENNIS J. HERRERA  
City Attorney  
MEREDITH B. OSBORN  
Chief Trial Deputy  
REBECCA A. BERS  
Deputy City Attorney

By: /s/ *Rebecca A. Bers*  
REBECCA A. BERS

Attorneys for Defendants  
KIERSTIE BARR, SAMSON HUNG, MARINA  
CHACON, FLINT PAUL, AND CITY AND COUNTY  
OF SAN FRANCISCO

Dated: April 8, 2021

BEN ROSENFELD  
SINGLETON LAW FIRM

By: /s/ Ben Rosenfeld  
BEN ROSENFELD

Attorneys for Plaintiffs  
KIRSTIN JOHNSON (on her own behalf and as GAL for  
her minor children)  
*\*Pursuant to L.R. 5-1(i)(3), the electronic signatory has  
obtained approval from this signatory.*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: April 9, 2021

**SALLIE KIM**  
United States Magistrate Judge